

70, 173

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19506, SPRINGFIELD, ILLINOIS 62794-9506 - (217) 782-2113

PAT QUINN, GOVERNOR

JOHN J. KIM, INTERIM DIRECTOR

217/785-1705

CONSTRUCTION PERMIT

PERMITTEE

Bagcraft Papercon I, L.L.C.
Attn: Richard Starling
3900 West 43rd Street
Chicago, Illinois 60632

Application No.: 12090003

I.D. No.: 031600ACL

Applicant's Designation:

Date Received: September 4, 2012

Subject: New Bagger Lines

Date Issued: October 24, 2012

Location: 3900 West 43rd Street, Chicago, Cook County

This Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of two new bagger lines (Lines 70 and 173), as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1. Description

This permit authorizes the installation of two new bagger lines (the affected lines). Each line would include a printing section and a bag-making section. In the printing section, the paper feedstock for the bags is prepared with flexographic printing. In bag-making section, adhesive is then immediately applied prior to forming the actual bags.

The printing section of one of the affected lines, Line 173, would have a natural gas fired dryer. For this purpose, the Permittee plans to use the dryer from existing Line 132, which it plans to remove from service.

Note: The other affected line, Line 70, would have an electrically heated dryer.

2. Applicable Emission Standards

- a. i. The affected lines are subject to 35 IAC 218.401(a)(2)(B), which provides that no owner or operator shall apply at any time any coating or ink unless the volatile organic material (VOM) content does not exceed one of the following limitations:

- A. 0.8 kg VOM/kg (0.8 lbs VOM/lb) solids applied; or
- B. 0.16 kg VOM/kg (0.16 lbs VOM/lb) inks and coatings applied.

- ii. The affected lines are subject to 35 IAC 218.401(d), which provides that no owner or operator shall cause or allow VOM containing cleaning materials, including used cleaning towels, associated with the affected lines to be kept, stored, or disposed of in any manner other than in closed containers, or conveyed from one location to another in any manner other than in closed containers or pipes, except when specifically in use.
- b. i. Each affected line is subject to 35 IAC 212.123(a), which provides that no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent into the atmosphere from any emission unit except as allowed by 35 IAC 212.123(b) or 212.124.
- ii. Each affected line is subject to 35 IAC 212.321(a), which provides that no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c).

3. Non-Applicability Provisions

- a. i. This permit is issued based on this project not being a major modification for purposes of 35 IAC Part 203: Major Stationary Sources Construction and Modification (MSSCAM). This is because the VOM emissions of the affected lines are not significant.
- ii. This permit is issued based on this project not changing the minor source status of the source for emissions of hazardous air pollutants (HAPs).

Note: The source's Clean Air Act Permit Program (CAAPP) permit, Permit 95050147, contains provisions limiting HAP emissions as well as other requirements to verify minor source status for HAP emissions, which will continue to apply to the source. These requirements will extend to the affected lines.

- b. This permit is issued based upon the affected lines not being subject to National Emission Standards for Hazardous Air Pollutants (NESHAP) for Printing and Publishing, 40 CFR 63 Subpart KK and for Paper and Other Web Coating, 40 CFR 63 Subpart JJJJ. This is because the source is not a major source of hazardous air pollutants (HAP) as defined by 40 CFR 63.2.

7. Recordkeeping Requirements

The Permittee shall maintain records of the following items:

- a. A file containing the VOM content of each coating and ink as determined by the applicable test methods and procedures specified in 35 IAC 218.105 to establish the records required under 35 IAC 218.404. [35 IAC 218.404(a)]
- b. Pursuant to 35 IAC 218.404(c)(2), the Permittee shall collect and record all of the following information each day for each affected line:
 - i. The name and identification number of each coating and ink as applied on the affected line.
 - ii. The VOM content of each coating and ink as applied each day on the affected line.
- c. VOM usage and VOM emissions for the affected lines (tons/month and tons/year) with supporting calculations and documentation.

8. Record Retention

All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection.

9. Reporting Requirements

- a. Pursuant to 35 IAC 218.404(c)(1), upon initial start-up of the affected line(s), the Permittee shall certify to the Illinois EPA that the affected line(s) will be in compliance with applicable requirements of 35 IAC 218.401(a) on and after the initial start-up date. Such certification shall include:
 - i. The name and identification number of each coating and ink as applied on each affected line.
 - ii. The VOM content of each coating and ink as applied each day on each affected line.
- b. Pursuant to 35 IAC 218.404(c)(3), the Permittee shall notify the Illinois EPA for the following instances:
 - i. Any record showing violation of 35 IAC 218.401(a) shall be reported by sending a copy of such record to the Illinois

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11. Authorization to Operate

The Permittee may operate the affected lines pursuant to this construction permit until CAAPP permit for the source is renewed or issued that addresses these lines. This condition supersedes Standard Condition 6.

If you have any questions on this permit, please contact Minesh Patel at 217/785-1705.

Edwin C. Bakowski

Edwin C. Bakowski, P.E.
Manager, Permit Section
Division of Air Pollution Control

Date Signed: *October 24, 2012*

ECB:MVP:psj

cc: Region 1



STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
P. O. BOX 19506
SPRINGFIELD, ILLINOIS 62794-9506

**STANDARD CONDITIONS FOR CONSTRUCTION/DEVELOPMENT PERMITS
ISSUED BY THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY**

July 1, 1985

The Illinois Environmental Protection Act (Illinois Revised Statutes, Chapter 111-1/2, Section 1039) authorizes the Environmental Protection Agency to impose conditions on permits which it issues.

The following conditions are applicable unless superseded by special condition(s).

1. Unless this permit has been extended or it has been voided by a newly issued permit, this permit will expire one year from the date of issuance, unless a continuous program of construction or development on this project has started by such time.
2. The construction or development covered by this permit shall be done in compliance with applicable provisions of the Illinois Environmental Protection Act and Regulations adopted by the Illinois Pollution Control Board.
3. There shall be no deviations from the approved plans and specifications unless a written request for modification, along with plans and specifications as required, shall have been submitted to the Agency and a supplemental written permit issued.
4. The permittee shall allow any duly authorized agent of the Agency upon the presentation of credentials, at reasonable times:
 - a. to enter the permittee's property where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit,
 - b. to have access to and to copy any records required to be kept under the terms and conditions of this permit,
 - c. to inspect, including during any hours of operation of equipment constructed or operated under this permit, such equipment and any equipment required to be kept, used, operated, calibrated and maintained under this permit,
 - d. to obtain and remove samples of any discharge or emissions of pollutants, and
 - e. to enter and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring, or recording any activity, discharge, or emission authorized by this permit.
5. The issuance of this permit:
 - a. shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are to be located,
 - b. does not release the permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the proposed facilities,
 - c. does not release the permittee from compliance with other applicable statutes and regulations of the United States, of the State of Illinois, or with applicable local laws, ordinances and regulations,
 - d. does not take into consideration or attest to the structural stability of any units or parts of the project, and

DIRECTORY
ENVIRONMENTAL PROTECTION AGENCY
BUREAU OF AIR

for assistance in preparing a permit application contact the Permit Section.

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section

1021 N. Grand Ave E.
P.O. Box 19506

Springfield, Illinois 62794-9506

for a regional office of the Field Operations Section. The regional offices and their areas of responsibility are shown on the map. The addresses and telephone numbers of the regional offices are as follows:

Illinois EPA
Region 1

Bureau of air, FOS

9511 West Harrison

Des Plaines, Illinois 60016

847/294-4000

Illinois EPA

Region 2

5415 North University

Peoria, Illinois 61614

309/693-5463

Illinois EPA

Region 3

2009 Mall Street.

Collinsville, Illinois 62234

618/346-5120

